

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DAMILARE SONOIKI,

Plaintiff,

v.

HARVARD UNIVERSITY, et al.,

Defendants.

Civil Action No. 1:19-cv-12172-LTS

**MOTION TO COMPEL PLAINTIFF TO ANSWER DEFENDANTS' DISCOVERY  
REQUESTS**

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37.1(b), Defendants Harvard University, Harvard University Board of Overseers, and the President and Fellows of Harvard College (together, "Harvard")<sup>1</sup>, hereby requests that the Court compel Plaintiffs to respond, in full, to Interrogatories 5, 11, 13 and Document Requests 3, 4, 5, and 6.

As explained in the accompanying Memorandum, and the Declaration and exhibits thereto, Plaintiff has refused to respond to basic interrogatories and document requests related to the core of his claims against Harvard. Among other omissions, he has failed to identify certain communications which he contends Harvard should have kept confidential; to identify the terms of any contract he asserts Harvard breached; and to identify the ways in which he purportedly mitigated his alleged damages.

For all of the reasons set forth in Harvard's Memorandum in Support of its Motion to Compel, Harvard respectfully requests that the Court issue an Order compelling Plaintiff to respond, in full, to Interrogatories 5, 11, 13 and Document Requests 3, 4, 5, and 6.

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<sup>1</sup> The Amended Complaint incorrectly identifies the Harvard entities as "Harvard University, Harvard University Board of Overseers, and the [sic] President and Fellows of Harvard College." President and Fellows of Harvard College is the legal entity for Harvard and is the only proper party to this litigation.

Dated: November 11, 2022

Respectfully submitted,

*/s/ Victoria L. Steinberg*

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Harvard University, Harvard University  
Board of Overseers, and the President and  
Fellows of Harvard College*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 37.1**

The undersigned counsel hereby certifies that Harvard's counsel conferred in good faith with Plaintiffs' counsel regarding the issues raised in this motion on November 2, 2022 and November 9, 2022.

Additional details are provided in Defendant's Memorandum in Support of its Motion to Compel, and the Declaration of Victoria Steinberg with its accompanying exhibits.

*/s/ Victoria L. Steinberg*  
Victoria L. Steinberg

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 11, 2022.

*/s/ Victoria L. Steinberg* \_\_\_\_\_  
Victoria L. Steinberg